



March 19, 2008

Via ECFS and Electronic Mail

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, D.C. 20554

Re: Request for Extension of Time to Construct Full-Power DTV Facilities
and Request for Confidential Treatment

Dear Ms. Dortch:

Nexstar Broadcasting, Inc. ("Nexstar"), the permittee of the digital television broadcast stations listed on Attachment 1 hereto, hereby requests an extension of the May 18, 2008 construction deadline for these seven stations. Nexstar also requests extension of the replication/maximization interference protection deadline to construct full-power facilities for the stations.

Nexstar is the licensee of 30 full-power television stations, operating in DMAs 8-201. The build out of DTV facilities for its stations is one of the highest priorities of the company, and all 30 of its stations are currently operating either full-power or low-power DTV facilities. Nexstar has devoted, and continues to devote, significant company resources to the successful transition of all 30 stations from analog to digital facilities by the February 17, 2009 deadline mandated by Congress.¹ Toward this goal, Nexstar has constructed the post-transition DTV facilities for 16 of its 30 stations, and these stations are either licensed or FCC Forms 302-DTV have been filed and are pending.² Within the past 18 months, Nexstar has constructed the DTV facilities for 11 of these 16 stations. The company's construction efforts over the past 18 months underscore the seriousness of its commitment to the DTV transition process.

¹ Nexstar's total expenditures to date on the DTV transition are approximately

² These 16 stations are KARD, West Monroe, Louisiana; KARK-TV, Little Rock, Arkansas; KFTA-TV, Fort Smith, Arkansas; KLBK-TV, Lubbock, Texas; KNWA-TV, Rogers, Arkansas; KSFX-TV, Springfield, Missouri; KTAB-TV, Abilene, Texas; KTAL-TV, Texarkana, Texas; WBRE-TV, Wilkes-Barre, Pennsylvania; WCIA, Champaign, Illinois; WLYH-TV, Lancaster, Pennsylvania; WMBD-TV, Peoria, Illinois; WQFR-TV, Rockford, Illinois; WROC, Rochester, New York; WTAJ-TV, Altoona, Pennsylvania; and WTVW, Evansville, Indiana.

The eight remaining Nexstar stations that are not the subject of the instant extension request either have August 18, 2008 or February 17, 2009 DTV construction deadlines and are not addressed herein.

Section 73.624(d)(3) of the Commission's rules allows for extension of DTV construction deadlines upon a demonstration by the permittee that the request for extension is due to circumstances that are either unforeseeable or beyond the licensee's control where the licensee has taken all reasonable steps to resolve the problem expeditiously.³ Such circumstances shall include, but shall not be limited to, the unavailability of facilities, such as a tower, because of delays in obtaining zoning or FAA approval or similar constraints or where the cost of construction exceeds the permittee's financial resources.⁴

Nexstar is committed to constructing full-power digital operations for its stations as expeditiously as possible. However, Nexstar's financial situation requires it to pace out the large cash expenditures of DTV construction consistent with the timeline set forth in Attachment 1. As of March 11, 2007, Nexstar had approximately \$ outstanding debt. Nexstar is not in a position to incur additional debt under its loan agreement or through the issuance of bonds for capital expenditures in the amount required to complete full-power DTV facilities for its remaining stations. Therefore, Nexstar is funding its full-power DTV conversion from its available working cash-flow.

In order to meet its other payment obligations (including payroll, programming and debt service costs) from its available cash flow and to remain in compliance with certain loan covenants, Nexstar, with input from its DTV contractors, vendors and consultants, has developed the timetable for DTV conversion set out in Attachment 1 based on its overall projected cash-flow and expenses. While there are variables beyond Nexstar's control, such as weather delays and manufacturers' scheduling conflicts, Nexstar projects that it will be able to initiate full-power digital operations consistent with this timeline.⁵

As Nexstar has stated in previous extension requests,⁶ the company is working with AZCAR and Morrison Hershfield (collectively "AZCAR") to complete the DTV transition. With AZCAR, Nexstar has created a master plan to convert its stations that are not yet operating full-power digital facilities by February 17, 2009. A significant challenge in meeting construction deadlines is the strengthening or replacement of the towers for all of these stations. It is estimated that the cost of these tower repairs/replacements will be approximately

³ 47 C.F.R. § 73.624(d)(3)(i) (2007).

⁴ Id. at § 73.624(d)(3)(ii).

⁵ Nexstar acknowledges that the Commission can extend DTV construction permits for six month, and that five of the seven stations listed in Attachment 1 have projected construction dates beyond November 18, 2008, which is six months from the date of expiration of the current permits for the stations. Nexstar anticipates having to file an additional extension request for these stations in September 2008.

⁶ In November 2007, Nexstar submitted an extension request, similar to the instant request, for these seven stations.

§ Attached hereto as Attachment 2 is a letter from Morrison Hershfield Corporation providing detailed information with respect to the required upgrades and/or repairs to each of the station's towers, including a tentative schedule for completing such actions.

Based on AZCAR's proposed construction plan, Nexstar has executed contracts with Acrodyne and Thompson-Grass Valley for transmitters; Dielectric for antennas and transmission line; Stainless Doty-Moore, Precision Communications and Radian for tower construction; and with Micro Communications, Inc. for RF systems. When Nexstar is ready to construct the full-power facilities for its stations it will execute contracts, on a station-by-station basis, for the needed repairs and upgrades for its towers.

AZCAR also estimated that the equipment necessary to initiate full-power DTV operating for its remaining stations (including antennas, transmitters, encoders, transmission line and non-tower site upgrades) will cost approximately \$. AZCAR further estimated that Nexstar will have to spend approximately \$ in engineering and consulting fees to bring all stations to full-power digital operation. Based on AZCAR's analysis, Nexstar believes it will cost approximately \$ (including tower upgrade costs) to convert its remaining stations to full-power digital operations.

In addition, the particular facts with regard to tower construction/site availability and international coordination for stations KBTB-TV, Port Arthur, Texas, KMID, Midland, Texas, and WFXV, Utica, New York are set out in Exhibit 1 of the respective FCC Form 337 for those stations.⁷

Based on the foregoing, Nexstar submits there is good cause for granting the applications for extension of time to construct the DTV stations listed in Attachment 1, and that a grant meets the requirements of Section 73.624(d)(3) of the Commission's rules. Such action is in the public interest as it will allow Nexstar to deliver full-power digital service on the stations listed Attachment 1 on or before the February 17, 2009 DTV transition deadline. Nexstar also requests a further extension of special temporary authority to continue operating the stations listed in Attachment 1 with the facilities specified in the requests for special temporary authority previously filed with the Commission until such time as the stations' full-power DTV facilities are constructed.

⁷ These facts were recently reported to the Commission in the DTV status reports (FCC Form 387) filed for these three stations on February 19, 2008.

Federal Communications Commission

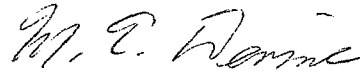
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Nexstar is submitting an application for extension of construction permit on FCC Form 337 for each of the stations listed in Attachment 1.

Please address any questions concerning this request for extension of time to Nexstar's counsel, Howard Liberman or Naomi Travers of Drinker Biddle & Reath LLP, at (202) 842-8800.

Very truly yours,

A handwritten signature in dark ink, appearing to read "M. E. Devine", written in a cursive style.

Matthew Devine
EVP & CFO

cc: Shaun Maher (Video Services Division)

ATTACHMENT 1

<u>Station</u>	<u>DTV Construction Permit</u>	<u>Anticipated Construction Date</u>
WTWO-DT	BMPCDT-20070125ADB	10/31/2008
WFFT-DT	BMPCDT-20070125ACY	10/31/2008
KFDX-DT	BMPCDT-20070621ABP	12/31/2008
KBTv-DT	BMPCDT-20040312ADS	12/31/2008
KMID-DT	BPCDT-19991029ADE	12/31/2008
WFXV-DT	BPCDT-19991028AIE	12/31/2008
KSNF-DT	BMPCDT-20070125ACP	02/17/2009

MORRISON HERSHFIELD CORPORATION
66 Perimeter Center East, Suite 600, Atlanta, Georgia 30346 USA
Tel. 770 379 8500 Fax. 770 379 8501



March 19, 2008

Mr. Rick Stolpe
Nexstar Broadcasting, Inc.
62 South Franklin Street
Wilkes-Barre, PA 18701

Re: Tower Upgrades

Dear Rick:

As part of our comprehensive analysis for Nexstar's full-power DTV television build-out we have determined that a number of your stations' antenna structures require strengthening or replacement prior to the installation of the equipment necessary for full-power DTV operations. Below is a summary of the current status of Nexstar's antenna structures, which are in need of repair before installing additional DTV equipment, a description of the work, required and an estimate of the time required to make the required repairs once work is begun.

Utica (WFXV) – The existing tower facility is not an option for this DTV antenna installation due to the tower height. There are two options currently being explored for this install, a) the construction of a new tower facility or b) mounting the equipment for the DTV operations on the WUTR tower owned by Mission Broadcasting. Both options are being reviewed in parallel as the initial review of the new tower showed that local zoning regulations may not be favorable to this new tower construction.

Joplin (KSNF) – This tower is significantly overstressed for the DTV antenna installation. The tower will require forty-seven bays of leg bracing and four levels of guy replacement.

Terre Haute (WTWO) – The equipment for the DTV operations for WTWO are being combined on a tower owned by Mission Broadcasting. This tower is moderately overstressed for the DTV antenna installations. The tower will require thirty bays of leg bracing, four bays of diagonal replacement and three levels of guy wire replacement.

Wichita Falls (KFDX) – This tower is significantly overstressed for the DTV antenna installation. The tower will require three new guy anchors, guy wire replacements at 441 ft, 681 ft and 941 ft above grade, leg reinforcement from base to 101 ft above grade and from 771 to 927 ft above grade, mid-panel bracing at select locations from base to 945 ft above grade, new diagonal bracing at select locations along the tower height and re-tensioning of all guy wires.

Beaumont (KBTV) – This tower is severely overstressed for the DTV antenna installation. The existing tower cannot be effectively modified for the new loading and will have to be either replaced with a new tower structure or an alternate tower will need to be located for the installation of the DTV antenna. Alternate rental locations are currently being evaluated.

Midland (KMID) – This tower is severely overstressed for the DTV antenna installation. The existing tower cannot be effectively modified for the new loading and will have to be either replaced with a new tower structure or an alternate tower will need to be located for the installation of the DTV antenna. Alternate rental locations are currently being evaluated.

Fort Wayne (WFFT) – This tower is moderately overstressed for the DTV antenna installation. The tower will require ten bays of leg bracing and reinforcement of select member connections over the full tower height.

Engineering work for KSNF, WTWO, KFDX and WFFT has already been completed. The material fabrication is currently in progress and the construction has been scheduled for these four stations. The tower construction and antenna installation for KFDX is expected to be complete by June 2008. The tower construction and antenna installations for WTWO and WFFT are expected to be complete by October 2008. The tower construction and antenna installation for KSNF is expected to be complete by February 2009.

For the remaining stations; KBTV, KMID and WFXV, alternate locations are being evaluated and all three stations are expected to be on air with full power DTV operations by December 2008.

The anticipated time periods are based on our experience with similar scope of work carried out on overstressed towers. This is subject to change depending on material and crew availability as well as unforeseen weather related delays.

Sincerely,



Shylesh Moras
Manager, Tower Upgrades
Morrison Hershfield Corporation
770-379-8509 (tel)
770-379-8501 (fax)

